

EXHIBIT "A"

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Attorneys for Crossgates Commons NewCo, L.L.C.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
(RICHMOND DIVISION)

In re:

CIRCUIT CITY STORES, INC., *et al.*

Debtors.

Case No. 08-35653-KRH
Jointly Administered
Chapter 11 Proceedings

**DECLARATION OF WILLIAM F. BAKER IN SUPPORT OF CROSSGATES COMMONS
NEWCo, L.L.C.'S RESPONSE TO THE LIQUIDATING TRUST'S NINTH OMNIBUS
OBJECTION TO LANDLORD CLAIMS (REDUCTION OF CERTAIN PARTIALLY
INVALID CLAIMS, RECLASSIFICATION OF CERTAIN MISCLASSIFIED CLAIMS,
DISALLOWANCE OF CERTAIN INVALID CLAIMS, DISALLOWANCE OF CERTAIN
LATE FILED CLAIMS, AND DISALLOWANCE OF CERTAIN AMENDED CLAIMS)**

STATE OF NEW YORK)
) SS:
COUNTY OF ONONDAGA)

WILLIAM F. BAKER, being duly sworn, deposes and says:

1. I am the Assistant General Counsel of Pyramid Management Group, LLC (the "Management Company"). The Management Company is the managing agent of Crossgates Commons NewCo, L.L.C. (the "Landlord") which is the owner of a shopping center known as Crossgates Commons, Albany, New York (the "Center").

2. I have personal knowledge of the facts set forth in this Declaration and I may be contacted at: Pyramid Management Group, LLC, 4 Clinton Square, Syracuse, New York 13202, (315) 422-7000.

3. The Landlord was a party to a lease (the "Lease") with Circuit City Stores, Inc. (the "Debtor") of premises (the "Premises") at the Center.

4. In the regular course of my employment by the Management Company, I review rent and other charges billed to the Landlord's tenants.


5. The total amount reserved under the Lease is \$12,230,918.34 and outstanding pre-petition rent under the Lease amounts to \$36,962.83. An itemization of the foregoing is attached to this Declaration as Schedule 1.

6. Fifteen percent (15%) of the total rent reserved is \$1,834,637.75.

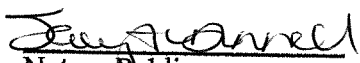
7. Furthermore, the total amount of post-petition use and occupancy charges due and owing is \$52,657.96. An itemization of this calculation is attached to this Declaration as Schedule 2.

8. The Landlord's claim filed for \$1,827,361.40 remains due.

9. The Landlord's claim filed for \$52,574.86 remains due.


WILLIAM F. BAKER
Assistant General Counsel
Pyramid Management Group, LLC

Sworn to before me this
5 day of April, 2011


Notary Public
SALLY A. O'DONNELL
Notary Public, State of New York
Qualified in Onondaga County
Commission Expires March 30, 2014

SCHEDULE "1"

04/05/11

NET PRESENT VALUE
OF FUTURE PAYMENTS
11/10/2008

TENANT:
MALL: CIRCUIT CITY - MERCHANT #610104
CROSSGATES COMMONS NEWCO LLC

TERM: 20 YEARS 8 MONTHS
TCD: 06/05/00
SQ. FT.: 37,671
EXPIRATION: 01/31/21
NPV DATE: 11/10/08

YEAR	RATE	RENT	MALL CHG	0.00%	TOTAL
NPV		\$9,980,074.14	\$3,250,844.21		\$12,230,918.34

YEAR	RATE	RENT	MALL CHG	8.00%	TOTAL
NPV		\$5,557,191.47	\$2,051,262.90		\$7,608,454.38

YEAR	RATE	RENT	MALL CHG	4.00%	TOTAL
NPV		\$6,993,105.79	\$2,556,130.05		\$9,549,235.84

MONTHLY CHARGES EFFECTIVE: 11/10/08

15%- 5 YR

	MINIMUM RENT	TAXES	INSURANCE	ENERGY	COMPACTOR	CPI	3%	CAE	WATER	MKT FUND	TOTAL
2008	51,300.05	16,703.32	0.00	0.00	0.00	4.525	87	4,525.87	0.00	0.00	72,529.24
2009	51,300.05	16,703.32	0.00	0.00	0.00	4.616	39	4,616.39	0.00	0.00	72,619.76
2010	51,300.05	16,703.32	0.00	0.00	0.00	4.754	88	4,754.88	0.00	0.00	72,758.25
2011	51,300.05	16,703.32	0.00	0.00	0.00	4.887	53	4,887.53	0.00	0.00	72,900.90
2012	58,995.06	16,703.32	0.00	0.00	0.00	5.044	45	5,044.45	0.00	0.00	80,742.83
2013	58,995.06	16,703.32	0.00	0.00	0.00	5.195	79	5,195.79	0.00	0.00	80,894.17
2014	58,995.06	16,703.32	0.00	0.00	0.00	5.351	66	5,351.66	0.00	0.00	81,050.04
2015	58,995.06	16,703.32	0.00	0.00	0.00	5.512	21	5,512.21	0.00	0.00	81,210.59
2016	67,844.32	16,703.32	0.00	0.00	0.00	5.677	58	5,677.58	0.00	0.00	90,225.22
2017	67,844.32	16,703.32	0.00	0.00	0.00	5.847	90	5,847.90	0.00	0.00	90,395.54
2018	67,844.32	16,703.32	0.00	0.00	0.00	6.023	34	6,023.34	0.00	0.00	90,570.98
2019	67,844.32	16,703.32	0.00	0.00	0.00	6.204	04	6,204.04	0.00	0.00	90,751.68
2020	67,844.32	16,703.32	0.00	0.00	0.00	6.390	16	6,390.16	0.00	0.00	90,937.80
2021	67,844.32	16,703.32	0.00	0.00	0.00	6.581	87	6,581.87	0.00	0.00	91,129.51

ANNUAL CHARGES (EFFECTIVE 11/10/2008)

15%- 5 YR

	MINIMUM RENT	TAXES	INSURANCE	ENERGY	COMPACTOR	CPI	3%	CAE	WATER	MKT FUND	TOTAL
2008	87,210.09	28,395.63	0.00	0.00	0.00	7.693	98	7,693.98	0.00	0.00	123,299.70
2009	615,600.60	200,439.84	0.00	0.00	0.00	55.396	68	55,396.68	0.00	0.00	871,437.12
2010	615,600.60	200,439.84	0.00	0.00	0.00	57.058	56	57,058.56	0.00	0.00	873,099.02
2011	700,245.71	200,439.84	0.00	0.00	0.00	58,770.34		58,770.34	0.00	0.00	959,455.89
2012	707,940.72	200,439.84	0.00	0.00	0.00	60,533.45		60,533.45	0.00	0.00	968,914.01
2013	707,940.72	200,439.84	0.00	0.00	0.00	62,349.45		62,349.45	0.00	0.00	970,730.01
2014	707,940.72	200,439.84	0.00	0.00	0.00	64,219.93		64,219.93	0.00	0.00	972,600.49
2015	805,282.58	200,439.84	0.00	0.00	0.00	66,146.53		66,146.53	0.00	0.00	974,527.09
2016	814,131.84	200,439.84	0.00	0.00	0.00	68,130.93		68,130.93	0.00	0.00	1,073,853.35
2017	814,131.84	200,439.84	0.00	0.00	0.00	70,174.86		70,174.86	0.00	0.00	1,084,746.54
2018	814,131.84	200,439.84	0.00	0.00	0.00	72,280.10		72,280.10	0.00	0.00	1,086,851.78
2019	814,131.84	200,439.84	0.00	0.00	0.00	74,448.51		74,448.51	0.00	0.00	1,089,020.19
2020	814,131.84	200,439.84	0.00	0.00	0.00	76,681.96		76,681.96	0.00	0.00	1,091,253.64
2021	67,844.32	16,703.32	0.00	0.00	0.00	6,581.87		6,581.87	0.00	0.00	91,129.51

(DISCOUNTED @ 0.00%)
(DISCOUNTED @ 4.00%)
(DISCOUNTED @ 8.00%)

NPV AS OF
NPV AS OF
NPV AS OF

\$12,230,918.34
\$9,549,235.84
\$7,608,454.38

15% of \$12,230,918.34 =

SCHEDULE 1 - RENT RESERVED

\$1,834,637.75

Circuit City store # 03160
Filing Date - 11/10/08
Crossgates Commons NewCo, LLC
Lease Rejected 3/10/09

Pre-Petition Amount Due			
2008			
	Oct & Prior	Nov 1-9	Total
Minimum Rent	\$0.00	\$15,390.02	\$15,390.02
Taxes	0.00	5,011.00	\$5,011.00
Common Area	15,204.05	1,357.76	\$16,561.81
Total	<u>\$15,204.05</u>	<u>\$21,758.78</u>	<u>\$36,962.83</u>
Payments			\$0.00
Balance			\$36,962.83
Accum Balance			\$36,962.83

SCHEDULE 1 - PRE-PETITION

SCHEDULE "2"

Circuit City store # 03160
Filing Date - 11/10/08
Crossgates Commons NewCo, LLC
Lease Rejected 3/10/09

Post-Petition Amount Due: 2009					
	Nov 10-30	December	January	February	March 1-10
Minimum Rent	\$35,910.03	\$51,300.05	\$51,300.05	\$51,300.05	\$16,549.40
Taxes	11,692.32	16,703.32	16,703.32	16,703.32	5,388.49
Common Area	3,168.11	4,525.87	4,616.39	4,616.39	1,489.25
Total	\$50,770.46	\$72,529.24	\$72,619.76	\$72,619.76	\$23,427.14
Payments		(72,024.86)	(72,024.86)	(72,024.86)	(23,233.82)
Balance	\$50,770.46	\$504.38	\$594.90	\$594.90	\$193.32
Accum Balance	\$50,770.46	\$51,274.84	\$51,869.74	\$52,464.64	\$52,657.96

Post Petition Balance \$52,657.96

Check #	Date Posted	Amount
4581513	12/05/2008	\$72,024.86
4591028	1/05/2009	\$72,024.86
4599577	2/04/2009	\$72,024.86
4606114	4/01/2009	\$23,233.82

SCHEDULE 2 - POST-PETITION